From:	Kitto, Alison
To:	Little, James MVN
Cc:	Chris Davis (rcdavis@wlf.la.gov); elizabeth.johnson@la.gov; Ettinger, John; Gutierrez, Raul; Joshua Marceaux; Kyle Balkum (kbalkum@wlf.la.gov); Patti Holland; seth_bordelon@fws.gov
Subject:	MVN-2013-02522 - Cheniere Energy
Date:	Friday, December 12, 2014 1:38:13 PM

James,

The U.S. Environmental Protection Agency has reviewed the Joint Public Notice, dated November 24, 2014, concerning Department of the Army Permit Application Number MVN-2013-02522-WII., The applicant, Cheniere Energy, is proposing to install, operate and maintain an approximately 90.5 miles of 42-inch and 13.4 miles of 36-inch natural gas transmission pipeline, requiring clearing, trenching, temporarily stockpiling and backfilling 190,589 cubic yards of material and horizontal directional drilling (HDD) operations. Work would be conducted in Calcasieu, Beauregard, Allen, and Evangeline Parishes, and the pipeline would run from a tie-in 1.1 miles north of the intersection of West Napoleon Street and Kim Street, in Sulphur, Louisiana, and terminating at new metering and regulating stations five miles northwest of Highway 10 in Ville Platte, Louisiana. According to the JPN, the proposed project would permanently impact approximately 34.4 acres of wetlands through conversion of PFO and PSS habitat to PEM within the permanent right of way, 18.48 acres through temporary conversion of PFO wetlands to PEM wetlands within the temporary right-of-way, and 66.4 acres of temporary PEM and PSS wetlands through temporary impacts in the ROW, for a total of 119.3 acres of jurisdictional wetlands impacted. The applicant proposes to compensate for unavoidable impacts to wetlands by purchasing mitigation credits or possibly implementing a Corps approved permittee responsible mitigation project within the New Orleans District.

The comments that follow are being provided for use in reaching a decision relative to compliance with the EPA's *404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230).*

- The information in the JPN did not include locations for the use of HDD. Impacts to aquatic resources should be minimized and avoided to the maximum extent practicable by using HDD for all crossings of perennial streams and high quality wetland resources, such as contiguous bottomland hardwood habitat.
- Hydrologic connectivity should be maintained in wetland areas by installing appropriately-sized culverts through any access roads in these habitats.
- The widths of all ROW within wetlands should be minimized to the maximum extent practicable to avoid unnecessary impacts to aquatic resources.
- Best management practices (BMPs) such as the use of sediment/erosion control structures should be implemented throughout construction to reduce the flow of nonpoint source pollution into adjacent wetlands and waters of the U.S.
- Since the pipeline traverses multiple hydrologic basins, the EPA recommends that the final mitigation plan employ a watershed approach, and calculate wetland impacts and required mitigation credits separately in each hydrologic basin, for all direct, indirect, and temporary impacts. To the maximum extent practicable, impacts should be mitigated in-kind, and any final mitigation plan should be designed to fully replace the loss of wetland functions and ecosystem services according the results of the MVN MCM, and be reviewed and approved by EPA and other regulatory and resource agencies.

Thank you for the opportunity to review and comment on the JPN. If you have any further

questions, please do not hesitate to contact me at kitto.alison@epa.gov, or 214-665-7482.

Best regards,

Alison Kitto
Life Scientist
Wetlands Section
USEPA Region 6
1445 Ross Ave. Dallas, TX
(214) 665-7482